

September 19, 2022

Christopher Davis  
Senior Planner  
Community Planning and Development Services  
City of Rockville  
111 Maryland Avenue  
Rockville, Maryland 20850

**RE: Waiver Request to Locate Transformer Above Ground**  
**Plan Description**  
**Site Plan Application No. STP2020-00399**  
**11511 Fortune Terrace**

Dear Mr. Davis,

In connection with the development of the property located at 11511 Fortune Terrace ("Property") and pursuant to Zoning Ordinance Section 25.17.03.c, the Applicant, Life Time Fitness, Inc., requests approval of a waiver to locate an electrical transformer above grade.

I. Project Description

The applicant has received approval of a Level 2 Site Plan to redevelop the property, removing the existing parking lot and adding a parking garage to the property (the "Project"), in addition to several other site improvements. One transformer is required to service the new parking garage. As indicated on the attached Exhibit 'A', the transformer is proposed to be located in the front left corner of the parking garage. The transformer will be heavily screened with evergreen plants from adjacent property owners and future multi-family units as shown on Exhibits 'B', 'C' and 'D'. Given the location of the Property, there is not expected to be any pass-by traffic; the only persons on site will be Life Time Fitness members, their guests, and staff of the fitness center. Given this, and that the proposed use is a service use, a properly enclosed above grade transformer is appropriate for the Project.

II. Justification for the Waiver

A. *The Unique and Peculiar Site Condition Provide a Physical Impediment to Installing the Transformer Underground (Section 25.17.03.c.1(a))*

The north side of the parking garage contains a Forest Conservation Easement, the east side of the garage abuts a linear park and the rear yards of townhouses, and the west side consists

of landscape screening of the parking garage at the benefit of the adjacent property owner. The proposed transformer location has been strategically placed to avoid heavily trafficked areas of pedestrians and meets PEPCO's access requirements for maintenance.

*B. It Would Be Unsafe to Locate the Transformer Underground (Section 27.17.03.c.1(b)).*

Allowing the transformer to be located above grade results in a much safer condition than if the transformer is required to be located underground. From PEPCO's standpoint, underground transformers require additional safety measures be taken when working on transformers in vaults, as compared to above-ground transformers. Work on the underground transformer requires workers to be in a confined environment, heavy equipment for lifting materials into and out of the vault, use of ladders to access the confined underground space, and barricading or fencing of the area in which the transformer is located to avoid accidental falls in the underground pit.

PEPCO's policy discourages the placement of transformers below grade, therefore there are not meaningful reasons why the transformer should be located underground.

*C. The Transformer Would Not Successfully Operate Below Ground (Section 25.17.03.c.1)).*

In addition to the risks discussed above, PEPCO's policy also discourages the placement of transformers underground for the basic reason that the logistics result in less efficient operations than for above ground transformers. Maintaining the transformer below grade takes more time, involves a greater cost, and requires a more complicated operation. Thus, to the extent maintenance of the transformer is needed, it can occur much more effectively and efficiently with located above grade.

As indicated on the graphics provided in Exhibits 'B', 'C' and 'D', the above ground transformer will comply with the screening set forth in Section 25.17.03.3

- a. Screening is required on four (4) sides of the equipment at a minimum of eighty (80) percent opacity. This screen may consist of either vegetative or building materials. The side for access may be a gate.*

Heavily landscape screening will occur on three sides of the transformer and an access gate will be the fourth side of the equipment.

- b. Vegetative screening must use plant material that will result in eighty (80) percent opacity within one (1) growing season.*



The applicant will be installing plant material that is evergreen and will achieve the 80% opacity within one growing season.

- c. Screening made of building materials must be designed in a manner that is complementary to the building architecture including material and scale.*

The gate will consist of building materials that are complementary of the existing building and parking garage.

- d. Where practical, all above ground electrical, telecommunications, and television equipment not incorporated into a building must be clustered with other utility equipment and dumpsters, trash enclosures, and generators, and shall be located in an inconspicuous manner so as to blend in with the landscaping and topography of the site. The side of the screening enclosure that provides access to the equipment must be oriented and either gated or screened in a manner that provides access while minimizing the visual impacts of the equipment.*

The location of the access gate was placed in an area of limited pedestrian area and the access gate will be designed to minimally impact views of the equipment.

Section 31B-5(a)(1) of the Montgomery County Code provides that the maximum daytime and nighttime noise levels for non-residential areas are 67dBA and 32dBA respectively, and the maximum daytime and nighttime noise levels for residential areas are 65dBA and 55dBA, respectively. The proposed above-grade transformer will comply with these requirements.

### III. Conclusion

For all of these reasons, we respectfully request that the Planning Commission approve the requested waiver. We appreciate your consideration of this request.

Sincerely,

**VIKA Maryland, LLC**



Robert B. Tilson, FASLA, PLA  
Director of Landscape Architecture/Executive Associate

CC: Justin Schmidt  
Michael Goodman